



UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

EIGHT MILE STYLE, LLC; MARTIN
AFFILIATED, LLC,

Plaintiffs,

v.

SPOTIFY USA INC.; HARRY FOX AGENCY,
LLC,

Defendants,

v.

KOBALT MUSIC PUBLISHING AMERICA, INC.

Third-Party Defendant.

Case No. 3:19-cv-00736

**UNITED STATES OF AMERICA’S UNOPPOSED MOTION FOR LEAVE
TO FILE DOCUMENTS UNDER SEAL**

Pursuant to § 5.07 of the Amended Practices and Procedures for Electronic Case Filing, Admin. Order 167-1 (Aug. 21, 2015), the United States of America respectfully moves for leave to file its Memorandum of Law in Support of the Constitutionality of the Music Modernization Act under seal. Counsel for the United States conferred with counsel for the other parties’ counsel, who do not oppose this request.

To “justify nondisclosure to the public,” “[t]he proponent of sealing must provide compelling reasons to seal the document and demonstrate that the sealing is narrowly tailored to those reasons—specifically, by ‘analyz[ing] in detail, document by document, the propriety of secrecy, providing reasons and legal selections.” *Beauchamp v. Fed. Hom Loan Mortg. Corp.*, 658 F. App’x 202, 207 (6th Cir. 2016) (quoting *Shane Grp., Inc. v. Blue Cross Blue Shield of Mich.*,